

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

In re:

Daniel John Dennis,
Amy Beth Dennis,

Debtors.

122 W. Walnut Street
Drexel, Missouri 64742
SSN: xxx-xx-7120
SSN: xxx-xx-8318

Case No.: 15-42136
Chapter 13

**APPLICATION FOR COMPENSATION FOR ATTORNEY FEES TO BE PAID
THROUGH THE CHAPTER 13 PLAN**

COMES NOW The Sader Law Firm, by and through its undersigned counsel and states that it is the attorney for the Debtor(s) in this Chapter 13 bankruptcy case. Counsel is seeking attorney fees pursuant to FRBP 2016(a) for work incurred on numerous matters from June 21, 2015 through August 20, 2015. In support of this Application, counsel states as follows:

1. The Debtor(s) filed under Chapter 13 on July 28, 2015. An Order Confirming the Chapter 13 Plan has not been entered by the Court.

2. Among the matters counsel has dealt with during the time period referenced above: prepared case for filing.

3. Attached as an exhibit to this Motion is a listing of the dates services were provided and the amounts of time incurred by this firm. In summary, the attached bill consists of the following totals:

a. Total hours of attorney Megan D. Dennis billed time –5.25 @ \$245.00 per hour =
\$1,286.25

b. Total hours of paralegal Allison M. Buente billed time – 0.00 @ \$85.00 per hour =
\$0.00

c. Total hours of paralegal Cynthia L. Palmer billed time – 6.70 @ \$95.00 per hour =
\$636.50

d. Total hours of legal assistant Cherylnn L. Guffey billed time - .50 @ \$80.00 per hour
= \$40.00

A copy of the current billing statement reflecting these charges is attached herein as Exhibit “A”.

4. Counsel for the debtor is requesting compensation for professional services at the following rates:

Neil S. Sader	\$310.00/per hour
Bradley D. McCormack	\$275.00/per hour
Megan D. Dennis	\$245.00/per hour
Tracy J. Wrisinger	\$260.00/per hour
Jonah W. Lock	\$225.00/per hour
Michael J. Wambolt	\$260.00/per hour
Connie S. Montemayor	\$105.00/per hour
Cynthia L. Palmer	\$95.00/per hour
Allison M. Buente	\$85.00/per hour

Counsel for the debtor states this is its standard hourly rate for these types of services.

In addition, counsel states that no fees have been charged in association with the preparation of this Fee Application.

5. Counsel states that the following payment(s) (which do not include any of the amounts requested in this Application) have either been made or promised to counsel for services rendered in connection with this case:

Fee Paid Outside: \$1,500.00

Fee Paid in Plan: \$0.00

6. The source of the compensation received has either been from the debtor or debtor's wages.

7. Counsel states that none of the compensation received has been shared with another entity. Further, there is no agreement or understanding between counsel and any other entity for the sharing of said compensation.

8. Counsel for the debtor(s) indicates that the above services have been completed, and as a result, the debtor(s) remains in Chapter 13 bankruptcy. Counsel states that the work performed for the debtor has been of substantial benefit to the debtor(s) and the estate, and as a result, requests compensation in the amount of \$1,962.75.

WHEREFORE, counsel for the debtor(s) respectfully requests this court allow attorney fees from July 21, 2015 through August 20, 2015 in the amount of \$1,962.75 to be paid through the Chapter 13 Plan.

SADER LAW FIRM, LLC

By: /s/ Megan D. Dennis

Megan D. Dennis, MO#63536
2345 Grand Boulevard, Suite 1925
Kansas City, Missouri 64108

816-561-1818

Fax: 816-561-0818

Direct Dial: 816-595-1808

mdennis@saderlawfirm.com

NOTICE OF APPLICATION FOR COMPENSATION

Any response to the motion must be filed with 21 days of the date of this notice, pursuant to Local rule 9013-1C, with the Clerk of the United States Bankruptcy Court. Parties represented by an attorney shall file electronically at <https://ecf.mowb.uscourts.gov>. Pro se parties shall mail filings to: United States Bankruptcy Court, Western District of Missouri, 400 East 9th Street, Room 1510, Kansas City, MO 64106. Pursuant to 9013-1D, responses shall address the merits of the motion and, if applicable, set out actions to remedy the particular problem. The Court will serve such response electronically on the Trustee, debtor's attorney and all other parties to the case who have registered for electronic filing. Respondent shall serve all parties who are not served electronically.

If a response is timely filed, a hearing will be held on a date and time determined by the Court. Notice of such hearing will be provided to all parties in interest. If no response is filed within 21 days, the Court will enter an order.

For information about electronic filing go to www.mow.uscourts.gov or call the Court's HELP line at 1-800-466-9302.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Application for Compensation for Attorney Fees to be Paid through the Chapter 13 Plan was served, in addition to the parties notified by US Bankruptcy Court's electronic notification, upon the debtor and creditors requesting service but not receiving electronic notice on this 24th day of August, 2015.

/s/ Megan D. Dennis

Megan D. Dennis, Attorney

Label Matrix for local noticing
0866-4
Case 15-42136-drd13
Western District of Missouri
Kansas City
Mon Aug 24 10:30:00 CDT 2015

BANK OF THE WEST
2527 CAMINO RAMON
SAN RAMON CA 94583-4213

Bank of America
1800 Tapo Canyon Rd
Simi Valley CA 93063-6712

Bank of the West
PO Box 4024
Alameda CA 94501-0424

Belton Regional Medical Center
PO Box 13620
Richmond VA 23225-8620

CMC Central Billing
c/o Kansas Counselors of KC
PO Box 14765
Shawnee Mission KS 66285-4765

College Park Family Care Ctr
Commerce Plaza II
7400 W. 110th Street, Ste. 600
Overland Park KS 66210-2360

Convergent Outsourcing
800 SW St.
PO Bo 904
Renton WA 98057-0904

Dan or Sheri Dennis
329 Hwy 2945
Cisco TX 76437-6123

Dana or Laura Stiles
30809 Southfork Dr.
Drexel MO 64742-9235

Dish Network
PO Box 94063
Palatine IL 60094-4063

Drexel Veterinary Clinic
104 E. Bates St.
Drexel MO 64742-8325

Fairpoint Community
c/o Credit Solutions
5454 Ruffin Rd.
San Diego CA 92123-1313

(p)FOCUSED RECOVERY SOLUTIONS
9701 METROPOLITAN COURT
STE B
RICHMOND VA 23236-3690

Ford Motor Credit
PO Box 152271
Irving TX 75015-2271

(p)FORD MOTOR CREDIT COMPANY
P O BOX 62180
COLORADO SPRINGS CO 80962-2180

Ford Motor Credit Company LLC
c/o Martin, Leigh, Laws & Fritzlen, P.C.
Melinda J. Maune
16305 Swingley Ridge Road, Suite 350
Chesterfield, MO 63017-1803

Kristi Adair
1300 Locust Street
Suite A
Harrisonville MO 64701-1366

Marine One Acceptance Corp.
5000 Quorum Dr.
Suite 200
Dallas TX 75254-7405

RSH & Associates LLC
PO Box 14515
Lenexa KS 66285-4515

Sprint
Attn: Bankruptcy Dept.
PO Box 7951
Overland Park KS 66207-0951

Virtuoso Services
4500 Cherry Creek South Drive
Suite 300
Denver CO 80246-1531

Amy Beth Dennis
122 W. Walnut St.
Drexel, MO 64742-2500

Daniel John Dennis
122 W. Walnut St.
Drexel, MO 64742-2500

Megan D Dennis
The Sader Law Firm
2345 Grand Boulevard, Suite 1925
Kansas City, MO 64108-2674

Richard Fink
Suite 1200
2345 Grand Blvd.
Kansas City, MO 64108-0001

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Ford Motor Credit Company LLC	End of Label Matrix	
	Mailable recipients	25
	Bypassed recipients	1
	Total	26



2345 Grand Boulevard, Suite 1925
 Kansas City, MO 64108
www.saderlawfirm.com
 816-561-1818
 816-561-0818

Mr. Daniel John Dennis
 Mrs. Amy Beth Dennis
 122 W. Walnut Street
 Drexel, MO 64742

August 20, 2015

RE: Chapter 13 Attorney Fees
 Case No. 15-42136
 Filed: July 28, 2015
 Confirmed:
 SSN: xxx-xx-7120
 SSN: xxx-xx-8318

Invoice # 23774

Professional Services

		<u>Hours</u>	<u>Amount</u>
7/8/2015	MDD Initial appointment with clients; drafted retainer agreement (no charge); initial review of packet, requested documents, Statement of Financial Affairs questions.	0.50	122.50
	CAP Prepare credit report.	0.30	28.50
	CLG Opened a new Chapter 13 Bankruptcy case for MDD.	0.50	40.00
7/9/2015	CAP Work on draft of Petition and Schedules.	2.80	266.00
7/10/2015	CAP Work on draft of Petition and Schedules.	1.20	114.00

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		<u>Hours</u>	<u>Amount</u>
7/13/2015	CAP Work on draft of Petition and Schedules	1.20	NO CHARGE
7/15/2015	CAP Work on revisions to Petition and Schedules	0.60	57.00
7/22/2015	CAP Create client's electronic document files; redact paystubs and tax returns; revise Schedule I	1.20	114.00
7/23/2015	MDD Emails to & from client re: paystub still needed	0.20	49.00
7/26/2015	MDD Reviewed and revised Petition, Schedules, Statement of Financial Affairs; drafted Affidavit re: Income; drafted Chapter 13 Plan	2.00	490.00
7/28/2015	MDD Meeting with client to finalize filing	0.50	122.50
	CAP Draft 341 Meeting letter to clients	0.30	28.50
7/29/2015	MDD Email to client re: creditor contact	0.20	49.00
7/30/2015	CAP Draft Trustee payment letter to clients	0.30	28.50
7/31/2015	MDD Call from Ford re: valuation of vehicle	0.20	49.00
8/3/2015	MDD Receipt & review of letter from Trustee re: future taxes and drafted explanatory email to clients re: same	0.20	49.00
8/6/2015	MDD Receipt and review of Proof of Claim 1 of Ford	0.20	49.00
8/7/2015	MDD Receipt and review of Proof of Claim 2 of Bank of the West	0.20	49.00
8/12/2015	MDD Receipt & review of Ford Motion for Relief	0.25	61.25
8/14/2015	MDD Receipt & review of Trustee's Motion to Deny Confirmation and drafted emails to client re: same	0.30	73.50

Mr. Daniel John Dennis

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	<u>Hours</u>	<u>Amount</u>
8/17/2015 MDD Drafted Objection to Claim 1 of Ford	0.25	61.25
8/18/2015 MDD Receipt & review of Proof of Claim 3 of Ford and drafted email to client re: same	0.25	61.25
	<u>13.65</u>	<u>\$1,962.75</u>
For professional services rendered		
Previous balance		(\$1,500.00)
		<u>\$462.75</u>
		<u><u>\$462.75</u></u>
Previous balance of Trust Account		\$359.00
7/28/2015 Filing Fee		(\$310.00)
		<u>\$49.00</u>
		<u><u>\$49.00</u></u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
CherylInn L. Guffey	0.50	80.00	\$40.00
Cynthia L. Palmer	6.70	95.00	\$636.50
Megan D. Dennis	5.25	245.00	\$1,286.25